

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
Irving H. Picard  
David J. Sheehan  
Seanna R. Brown  
Heather R. Wlodek

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR  
INTERIM COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED  
BY APPLICANTS FROM APRIL 1, 2023 THROUGH JULY 31, 2023**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff  
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll  
and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On October 26, 2023, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from April 1, 2023 through July 31, 2023 (the "Fee Applications"). These Fee Applications include the following:

- A. Forty-Third Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2023 through July 31, 2023 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 4/1/2023 to 7/31/2023, fee: \$37,990,399.23, expenses: \$192,198.45 filed by Baker & Hostetler, L.L.P. (Filed: 10/26/2023) [ECF No. 23694]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2023 through July 31, 2023 for Schiltz & Schiltz, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$34,338.57, expenses: \$2,232.01 filed by Schiltz & Schiltz (Filed: 10/26/2023) [ECF No. 23695]
- C. Application of Soroker Agmon Nordman Riba as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2023 through July 31, 2023 for Soroker Agmon Nordman, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$519,769.27, expenses: \$0.00 filed by Soroker Agmon Nordman (Filed: 10/26/2023) [ECF No. 23696]
- D. Application of Application of UGGC & Associes as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for UGGC & Associes, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$26,119.58, expenses: \$0.00. filed by UGGC & Associes (Filed: 10/26/2023) [ECF No. 23697]
- E. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2023 through July 31, 2023 for Browne Jacobson, LLP, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$126,109.13, expenses: \$1,659.71. filed by Browne Jacobson, LLP (Filed: 10/26/2023) [ECF No. 23698]

- F. Application of Alpeggiani Studio Legale Associato as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Alpeggiani Studio Legale Associato, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$1,087.57, expenses: \$1.97. filed by Alpeggiani Studio Legale Associato (Filed: 10/26/2023) [ECF No. 23700]
- G. Application of Kugler Kandestin, L.L.P. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Kugler Kandestin, L.L.P., Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$3,404.84, expenses: \$0.00. filed by Kugler Kandestin, L.L.P. (Filed: 10/26/2023) [ECF No. 23701]
- H. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services from April 1, 2023 through July 31, 2023 for Monfrini Bitton Klein, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$5,028.29, expenses: \$0.00. filed by Monfrini Bitton Klein (Filed: 10/26/2023) [ECF No. 23702]
- I. Application of Travers Thorp Alberga as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Travers Thorp Alberga, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$1,269.00, expenses: \$0.00. filed by Travers Thorp Alberga (Filed: 10/26/2023) [ECF No. 23703]
- J. Forty-Second Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2023 through July 31, 2023 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$3,203,132.00, expenses: \$713.65. filed by Windels Marx Lane & Mittendorf, LLP (Filed: 10/26/2023) [ECF No. 23704]
- K. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Velitor Law, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$32,404.21, expenses: \$0.00. filed by David J. Sheehan, Velitor Law (Filed: 10/26/2023) [ECF No. 23705]
- L. Application of Alfaro, Ferrer & Ramirez as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Alfaro, Ferrer, Ramirez, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$1,757.48, expenses: \$0.00. filed by Alfaro, Ferrer, Ramirez (Filed: 10/26/2023) [ECF No. 23706]
- M. Application of Tan Kok Quan Partnership as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2023 through July 31,

2023 for Tan Kok Quan Partnership, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$28,355.73, expenses: \$592.52. filed by Tan Kok Quan Partnership (Filed: 10/26/2023) [ECF No. 23707]

- N. Application of Daeryook & Aju LLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 17, 2023 through July 31, 2023 for Daeryook & Aju LLC, Special Counsel, period: 4/17/2023 to 7/31/2023, fee: \$19,446.75, expenses: \$0.00. filed by Daeryook & Aju LLC (Filed: 10/26/2023) [ECF No. 23708]
- O. Seventeenth Application of Kelley, Wolter & Scott, Professional Association as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Kelley, Wolter & Scott, Professional Association, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$2,970.02, expenses: \$0.00. filed by Kelley, Wolter & Scott, Professional Association (Filed: 10/26/2023) [ECF No. 23709]
- P. Fourteenth Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through July 31, 2023 for The Scaletta Law Firm, PLLC, Special Counsel, period: 8/1/2022 to 7/31/2023, fee: \$3,555.72, expenses: \$0.00. filed by The Scaletta Law Firm, PLLC (Filed: 10/26/2023) [ECF No. 23710]
- Q. Third Application of Holland & Hart LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2023 through July 31, 2023 for Holland & Hart LLP, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$23,779.30, expenses: \$17.50. filed by Holland & Hart LLP (Filed: 10/26/2023) [ECF No. 23711]
- R. Sixth Application of Bowman and Brooke LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2023 through July 31, 2023 for Bowman & Brooke LLP, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$47,031.00, expenses: \$1,342.50. filed by Bowman & Brooke LLP (Filed: 10/26/2023) [ECF No. 23712]
- S. Thirty-Eighth Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2023 through July 31, 2023 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 4/1/2023 to 7/31/2023, fee: \$153,063.63, expenses: \$1,044.15. filed by Young Conaway Stargatt & Taylor, LLP (Filed: 10/26/2023) [ECF No. 23713]

2. The deadline for filing objections to the Fee Applications expired on November 27, 2023 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for December 20, 2023 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the "Order") that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: November 29, 2023  
New York, New York

By: /s/ David J. Sheehan  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Tel: (212) 589-4200  
Fax: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Seanna R. Brown  
Email: sbrown@bakerlaw.com  
Heather R. Wlodek  
Email: hwlodek@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff*